

1 GEOFFREY A. HANSEN  
2 Acting Federal Public Defender  
3 ANGELA M. HANSEN  
4 Assistant Federal Public Defender  
5 555 - 12th Street, Suite 650  
6 Oakland, CA 94607-3627  
7 Telephone: (510) 637-3500

5 | Counsel for Defendant DASA

6

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

18 The above-captioned matter is set on January 24, 2012 before this Court for a status  
19 hearing. The parties jointly request that the Court continue the matter to October 25, 2012, at  
20 9:00 a.m., before the sitting magistrate court, and that the Court exclude time under the Speedy  
21 Trial Act, 18 U.S.C. § 3161, between August 30, 2012 and October 25, 2012, so that the defense  
22 can have additional time to review and assess the voluminous discovery in this case, including  
23 supplemental discovery that the government has produced.

24 On October 7, 2011, the United States Attorney filed a one-count Information charging  
25 defendants with conspiracy to commit visa fraud in violation of 18 U.S.C. §§ 371 and 1546(a).  
26 On October 11, 2011, the defendants appeared before the magistrate court, waived Indictment

**Stip. Req. To Continue Hearing Date and to Exclude Time, No. CR-11-0742 SBA**

1 and were arraigned. Defendants face a maximum sentence of five years imprisonment on this  
2 charge.

3 This case is related to a larger investigation involving Tri-Valley University ("TVU"),  
4 which the government has alleged was a sham university that accepted foreign students and  
5 issued legal status for these students without requiring that they attend classes. *See* Indictment in  
6 *United States v. Susan Su*, CR 11-00288-SBA. Ms. Su's case is set for trial before the Honorable  
7 Saundra Brown Armstrong in April 2013.

8 The four defendants charged in this case request additional time to review the discovery  
9 that the government has already produced, which includes voluminous files from TVU  
10 computers that the government seized and that the defendants need to review. Additionally, the  
11 defense has received additional discovery relating to the broader investigation in this case, and  
12 the defense needs additional time to review those materials. For these reasons, the defense  
13 requests additional time to review discovery and to assess this case, and the parties agree that this  
14 is an appropriate reason to continue this case until October 25, 2012.

15 The parties stipulate and agree that the ends of justice served by this continuance  
16 outweigh the best interest of the public and the defendants in a speedy trial. The parties further  
17 agree that the failure to grant this continuance would unreasonably deny counsel for defendants  
18 the reasonable time necessary for effective preparation, taking into account the exercise of due  
19 diligence. Accordingly, the parties agree that the period of time from August 30, 2012 until  
20 October 25, 2012, should be excluded in accordance with the provisions of the Speedy Trial Act,  
21 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv), for effective preparation of defense counsel, taking into  
22 account the exercise of due diligence.

23 DATED: August 27, 2012

\_\_\_\_\_  
/S/  
WADE M. RHYNE  
HARTLEY M.K. WEST  
Assistant United States Attorneys

1 DATED: August 27, 2012

2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26

/S/  
KENNETH MCGUIRE  
Counsel for Tushar Tambe

DATED: August 27, 2012

/S/  
GINNY H.K. WALIA  
Counsel for Ramakrishna Reddy Karra

DATED: August 27, 2012

/S/  
GALIA AMRAM PHILLIPS  
Counsel for Anji Reddy Dirisinala

DATED: August 27, 2012

/S/  
ANGELA M. HANSEN  
Assistant Federal Public Defender  
Counsel for Vishal Dasa

## ORDER

2       Based on the reasons provided in the stipulation of the parties above, the Court hereby  
3 FINDS:

4           1. Given that this case is related to a larger investigation involving Tri-Valley  
5 University and the Indictment in *United States v. Susan Su*, CR 11-00288-SBA, and that the  
6 government produced discovery to defendants that includes voluminous computer files from the  
7 University that the defense needs to review;

8           2.     Given that the government has produced discovery relating to the broader  
9 investigation of this case to each individual defendant;

10           3.     Given that a complete review of the discovery is necessary to the defense  
11 preparation of the case and that the failure to grant the requested continuance would  
12 unreasonably deny counsel for defendants the reasonable time necessary for effective  
13 preparation, taking into account the exercise of due diligence;

14           4.     Given that the ends of justice served by this continuance outweigh the best interest  
15           of the public and the defendants in a speedy trial;

16       Based on these findings, IT IS HEREBY ORDERED that the STATUS date of August  
17 30, 2012, scheduled at 9:30 a.m., before the Honorable Kandis A. Westmore, is vacated and reset  
18 for October 25, 2012, at 9:30 a.m., before the sitting United States Magistrate Court. It is  
19 FURTHER ORDERED that time is excluded pursuant to the Speedy Trial Act, 18 U.S.C. §  
20 3161(h)(7)(A) and (B)(iv), from August 30, 2012 until October 25, 2012.

22 | August 28, 2012

Kandis Westmore  
KANDIS A. WESTMORE  
United States Magistrate Judge